

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PUMPONATOR INC.,)	
a South Carolina Corporation,)	
)	
Plaintiff,)	Case No. 11-cv-03956
)	
v.)	Judge John Z. Lee
)	Magistrate Judge Geraldine Soat Brown
WATER SPORTS, LLC, an Illinois)	
limited liability company,)	
KETZ & ASSOCIATES, INC., a)	
Minnesota Corporation, and)	
BRAD KETZ, an individual,)	
)	
Defendants.)	
)	

**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT PURSUANT TO
SETTLEMENT**

NOW COMES the Plaintiff, PUMPONATOR, INC., by and through its attorneys, BELLAS & WACHOWSKI, and Defendant, WATER SPORTS, LLC, (collectively the “Parties”), by and through its attorneys, CLINGEN CALLOW & MCLEAN and ERICKSON LAW GROUP, and jointly move this Honorable Court for the entry of a final judgment pursuant to settlement. In support thereof, the Parties submit as follows:

1. Plaintiff’s Complaint alleges against Water Sports causes of action for trade dress infringement under Section 43(a) of the Lanham Act, and common law trade dress infringement and unfair competition.
2. The Parties have agreed to settle all outstanding matters in connection with this litigation.

3. To memorialize the agreement between the Parties to settle all outstanding matters related to this action, the parties have entered into a Release and Settlement Agreement.

4. Pursuant to the terms of the Agreement, the Parties jointly move for the entry of an Agreed Final Judgment. A true and correct copy of said proposed Judgment is attached hereto marked as “**Exhibit A**”.

WHEREFORE, the Parties, through their respective counsel, request that this Honorable Court dismiss the action against Defendant Water Sports with prejudice pursuant to settlement and for any other relief this Court deems fair and just.

Dated: June 14, 2012.

/s/ Misty J. Cygan
Misty J. Cygan
Bellas & Wachowski
15 N. Northwest Highway
Park Ridge, Illinois 60068
Phone: 847.823.9030
george@bellas-wachowski.com
Counsel for Pumponator, Inc.

/s/ Kenneth J. Vanko
Kenneth J. Vanko
Adisa Krupalija
Clingen Callow & McLean, LLC

2100 Manchester Road, Suite 1750
Wheaton, Illinois 60187
Phone: 630.871.2600
vanko@ccmlawyer.com
Counsel for Water Sports, LLC

/s/ Eric R. Waltmire
Eric R. Waltmire
Erickson Law Group PC
1749 S. Naperville Road,
Suite 202
Wheaton, Illinois 60189
Phone: 630.388.7053
eric@ericksonlawgroup.com